

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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In re: : Chapter 9  
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CITY OF DETROIT, MICHIGAN, : Case No.: 13-53846  
:  
Debtor. : Hon. Steven W. Rhodes  
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**INTERROGATORIES OF INTERNATIONAL UNION, UAW  
TO THE GENERAL RETIREMENT SYSTEM OF THE CITY OF DETROIT  
REGARDING PLAN CONFIRMATION**

Pursuant to Federal Rule of Bankruptcy Procedure 7033, Federal Rule of Civil Procedure 33 and the Court's April 2, 2014 Third Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtors' Plan of Adjustment [Docket #3632], the International Union, UAW ("UAW") requests that General Retirement System of the City of Detroit ("GRS") answer in writing and under oath the following interrogatories and serve the responses upon the undersigned counsel no later than April 25, 2014.

**DEFINITIONS**

- A. "DLC" means the Detroit Library Commission.
- B. "Identify" means to give, to the extent known, the person's full name; present or last known address; telephone number(s); and present or last known place of employment.

**INSTRUCTIONS**

- C. In your answers to those Interrogatories that seek information about GRS funded versus unfunded liabilities, and about GRS assets, provide the information separately as it

is calculated using each of the following methods: (1) the market value of the assets, (2) the actuarial value of the assets; and (3) the funding value of the assets

D. In answering these Interrogatories, furnish all information that is available to you or otherwise subject to your custody or control.

E. These Interrogatories shall be continuing in nature, and to the extent that answers thereto may be modified by information discovered by you subsequent to the service of your initial answers hereto, you are requested to serve promptly thereafter supplemental answers setting forth such information.

F. If you have some information responsive to a particular Interrogatory but cannot provide all of the information requested, your response should so state; provide the reasons for your inability to provide specific or full information; provide the best or most complete or most specific information that you can provide on the subject; and identify every person whom you believe has the requested information.

G. With respect to any Interrogatory to which you assert a claim of privilege, provide, at the time the Interrogatories are answered, a statement setting forth the basis for your claim of privilege and fully identifying any information withheld that may be within the scope of the request.

### **INTERROGATORIES**

1. State, separately for each category, the number of GRS participants who are (1) active DLC employees; (2) deferred vested former DLC employees; and (3) retired former DLC employees.

2. State the amount of contributions made each year since 2009 to the GRS by the DLC, on its behalf, or with monies it provided and/or on behalf of GRS participants who

are or were active, deferred vested or retired DLC employees. Specify separately the amount of employer contributions versus employee contributions.

3. State the amount of GRS's accrued liabilities attributable or allocable to GRS participants who are active, deferred vested or retired DLC employees. State separately the funded versus unfunded amount of these liabilities.

4. State the percentage of GRS's total funded and unfunded accrued liabilities that is attributable or allocable to GRS participants who are active, deferred vested or retired DLC employees.

5. State the amount of GRS's total assets that are attributable to contributions, and earnings on contributions, made by the DLC, on its behalf, or with monies that it provided, and/or on behalf of GRS participants who are or were active, deferred vested or retired DLC employees.

6. State the percentage of GRS's total assets attributable to contributions, and earnings on contributions, made by the DLC, on its behalf, or with monies that it provided, and/or on behalf of GRS participants who are or were active, deferred vested or retired DLC employees.

7. Identify each person who provided the information that you relied upon in answering these interrogatories.

8. Identify the person or persons most knowledgeable about your answers to these interrogatories.

Dated: New York, New York  
April 11, 2014

International Union, UAW

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**CERTIFICATE OF SERVICE**

I certify that on this 11<sup>th</sup> day of April 2014, I caused the foregoing document to be served on counsel for the GRS and for all other parties of record through the Court's CM/ECF system

/s/ *Peter D. DeChiara*  
Peter D. DeChiara